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AIRCRAFT OWNERS AND PILOTS ASSOCIATION

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DEPT. OF TRANSPORTATION
DOCKETS

2003 MAY -8 A 11: 22

May 7, 2003

FAA-03-14698-5

Docket Management System
U.S. Department of Transportation
Room PL 401
400 Seventh Street, SW
Washington, DC 20590

Re: Docket No. FAA-2003-14698: Designation of Class A, B, C, D, and E Airspace
Areas: Air Traffic Service Routes; and Reporting Points.

Dear Sir or Madam:

On behalf of nearly 400,000 members operating over 200,000 general aviation aircraft, many with either existing Global Positioning System (GPS) navigation capabilities or contemplating such installations, the Aircraft Owners and Pilots Association (AOPA) offers the following comments on the changes to 14 CFR Parts 1, 71, 95, and 97 to become effective on May 15, 2003. While AOPA concurs with the changes promulgated in this final rule, it appears that with the publication of the final rule, the FAA has omitted an essential and immediate application that should be implemented.

While we understand that great emphasis and resources are being applied to development of RNAV capability for the High Altitude Airspace Redesign project, AOPA expects the rule to enable the capabilities we have requested since December 2000 for operations in the low-altitude environment. Strategically placed GPS-based Area Navigation (RNAV) routes should be established and charted on appropriate aeronautical charts in all airspace (including airspace not covered by radar) for use by aircraft with existing GPS navigation equipment installed and certified for IFR operations. These routes expand IFR operations at lower altitudes, increase capability for IFR operations, and increase direct route capability in all airspace, including Visual Flight Rule (VFR) operations in complex terminal airspace. In addition to the safety and efficiency benefits, RNAV routes will encourage airspace users to equip with GPS, which is consistent with the FAA's strategic planning for the modernization of the National Airspace System. The following applications should be implemented for GPS-based RNAV routes:

- Lower the minimum en route altitude (MEA) on Victor airways for GPS equipped aircraft. The MEA should be lowered to the minimum allowable for communications with air traffic control and/or terrain clearance.

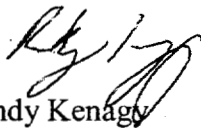
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- Increase access to Class B airspace by establishing IFR and VFR RNAV routes through the vertical and lateral boundaries of that airspace between 3,000 and 8,000 above ground level. Additional access to Class B airspace should be provided by establishing specific RNAV routes for ingress and egress to satellite airports by small, slow general aviation aircraft.
- Increase access to Special Use Airspace by charting routes that are not dependent on NAVAID siting; this permits more efficient IFR operation at altitudes below 18,000 feet.
- Enable RNAV access to geographic areas where reductions in the ground-based navigation infrastructure limits IFR access to airports, (e.g., the Outer Banks of North Carolina). Without RNAV routes, this problem may result in more operations in marginal VFR conditions with greater safety risks than IFR operations.

In its analysis of public comments, the FAA stated that the above applications were outside the scope of the proposed rule and that separate efforts were underway that would address AOPA's concerns. AOPA believes however, that our comments were consistent with the intent of the regulation, i.e. "...to facilitate the use of RNAV throughout all phases of flight..." Accordingly, we are resubmitting them to the docket.

While many in general aviation look forward to the capabilities that this regulation will provide, AOPA re-emphasizes strongly that the application of the new regulatory provisions must not impact adversely the majority of general aviation aircraft that are not equipped with IFR GPS capability. Thank you for the opportunity to comment.

Sincerely,



Randy Kenagy
Director, Advanced Technology